

Terence C. Dougherty, Pro Se Litigant
Lisbet Drivdahl Dougherty (Spouse), Pro Se Litigant
503 Righters Ferry Road
Bala Cynwyd, Pennsylvania 19004
(610) 668-0655

**IN THE UNITED STATES DISTRICT COURT
FOR THE PENNSYLVANIA EASTERN DISTRICT COURT
DISTRICT OF PHILADEPHIA**

LSF8 Master Participation Trust by	§	
Caliber Home Loans, Inc., solely in its	§	
capacity as servicer,	§	
PLAINTIFF,	§	
	§	
v.	§	Civil Action No.: <u>15 5005</u>
	§	
Terence C. Dougherty, Pro Se Litigant	§	
Lisbet Drivdahl Dougherty, (Spouse)	§	
Pro Se Litigant	§	
DEFENDANTS	§	

**DEFENDANTS MEMORANDUM IN SUPPORT OF
MOTION TO ENLARGE TIME**

Defendants asks this Honorable Court to grant additional time to file an Answer in Opposition to Plaintiff's Motion to Remand Case to State Court, as authorized by Federal Rule of Civil Procedure 6(b).

A. Introduction

1. Plaintiff is LSF8 Master Participation Trust By Caliber Home Loans Inc. Defendants are Terence C. Dougherty, Pro Se Litigant and Lisbet Drivdahl (Spouse), Pro Se Litigant.
2. Plaintiff sued defendants for Compliant In Mortgage Foreclosure on September 2, 2014.
3. Defendants filed a Notice of Removal under 28 U.S.C. §1446(a) on September 8, 2015.

4. Defendants are petitioning this Honorable Court for an extension of time to file an Answer in Opposition to Plaintiff's Motion to Remand To State Court.

5. Defendants contacted opposing counsel who declined to stipulate for an extension of time. Defendants filed this request for an extension as soon as they became aware of the need for additional time and before the deadline.

B. Argument

6. The court may grant a request for extension of time for "cause shown." Fed. R. Civ. P. 6(b).

7. Defendants requests the extension of time to research and prepare a proper written Answer in Opposition To Remand To State Court because defendants are Pro Se Litigants, defendants are not lawyers, defendants both work full time and there are complex issues and statements alleged by the Plaintiff's attorneys in their Motion.

8. Defendants asks the court to extend the deadline until December 17, 2015.

9. Defendants request for additional time is for cause shown, as stated in this motion, not to delay these proceedings. *See* Fed. R. Civ. P. 6(b).

C. Conclusion

10. For the reasons cited above defendants request this Honorable Court for the extension of time to respond to Plaintiff's Motion To Remand To State Court until December 17, 2015.

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Terence C. Dougherty, Pro Se Litigant §
Lisbet Drivdahl Dougherty, (Spouse) §
Pro Se Litigant §
DEFENDANTS §

Civil Action No.:15 5005

ORDER GRANTING DEFENDANTS MEMORANDUM IN SUPPORT OF
MOTION TO ENLARGE TIME

AND NOW, this _____ day of _____, 201__ upon consideration of Defendants Motion for an order To Enlarge Time and Defendants Memorandum in support thereof, it is hereby ORDERED that:

1. Defendants Motion To Enlarge Time is GRANTED

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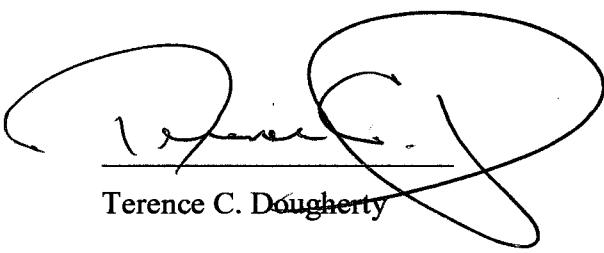
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Civil Action No.:15 5005

CERTIFICATE OF SERVICE

I, Terence C. Dougherty, certify that on this 30 day of the month of December, 2015, a copy of the foregoing was mailed via the United States Postal Service by certified mail, first class with sufficient postage prepaid and addressed to:

Richard M. Squire & Associates, LLC
Attn: Robert M. Kline
One Jenkintown Station, Suite 104
115 West Avenue
Jenkintown, PA 19046
Attorney for Plaintiff


Terence C. Dougherty